REMARKS

I. INTRODUCTION

Claims 1-15 and 19-21 are pending in the present Application. No new matter has been added. In view of the following remarks, it is respectfully submitted that all of the pending claims are allowable.

II. CLAIM REJECTIONS – 35 U.S.C. § 103(a)

Claims 1-15 and 19-21 stand rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 5,216,612 to Cornett et al. (hereinafter "Cornett") in view of U.S. Patent No. 6,681,990 to Vogler et al. (hereinafter "Vogler") and further in view of U.S. Patent No. 5,884,300 to Brockman (hereinafter "Brockman"). (See 1/23/09 Office Action, pp. 2-17.)

Claim 1 recites "[a] method of automatically updating inventory data in an inventory management system, the method comprising: in a computer software application, requesting a plurality of inventory models from the inventory management system, the plurality of inventory models comprising default configuration data for telecommunications equipment in a central office in a telecommunications network; selecting at least one model from the plurality of requested inventory models; generating an inventory update form for each of the plurality of inventory models in the software application program; automatically populating each inventory update form with updated inventory data in the software application program, the updated inventory data comprising specific operating parameters for the inventoried equipment in the inventory management system; and sending the updated inventory data from the software application program to the inventory management system."

Addressing the limitation "the plurality of inventory models comprising default configuration data for telecommunications equipment in a central office in a telecommunications network," the Examiner cites Brockman, col. 3, ll. 45-67, and col. 6, ll. 15-29, and Fig. 7. (See

2

1/23/09 Office Action, pp. 4-5.) This citation restates that made in the previous Final Office Action, despite the addition of a new limitation to claim 1. (See 7/9/08 Office Action, p. 4.) In responding to the Applicants' previous arguments, the Examiner restates the above, stating that he "relied on the teaching of Brockman in Col. 3, lines 45-67; col. 6, lines 15-29) which correspond to Applicant's claimed feature. Therefore, Applicant's argument is not persuasive and the rejection is hereby sustained." (1/23/09 Office Action, p. 18, ll. 5-8.) It is respectfully submitted that this "Response to Arguments" is wholly unresponsive to the arguments previously raised by the Applicants. The Examiner asserts that the teachings of Brockman correspond to the recitation of claim 1, but provides neither reference to the elements of the system of Brockman that supposedly "correspond" to the "configuration data" or the "telecommunications equipment" of claim 1, nor any other support for this assertion. Nor could the Examiner have done so, as Brockman does not disclose or suggest "the plurality of inventory models comprising default configuration data for telecommunications equipment in a central office in a telecommunications network" for the reasons discussed below.

The first cited passage is concerned with the system (1) determining that certain products are present in inventory and (2) arranging for the products to be picked from the consignment warehouse 350. (See Brockman, col. 3, ll. 45-67.) It also relates to inventory values that signify the amount of inventory at a particular distribution center. (See id., col. 3, ll. 45-67.) The passage does not deal with configuration data for equipment because no signal in this passage is described as capable of altering or affecting the way that the inventoried products operate. It is not as if, for instance, Brockman generates a signal indicating that a piece of equipment in inventory is to be cabled according to arrangement A as opposed to arrangement B once the equipment is delivered to and implemented by its intended user.

The second cited passage also lacks a logical relationship to the recited configuration data. This passage merely describes how certain functions can be implemented as software modules, and how data from the distribution centers are supplied to the general-purpose computer that executes these modules. (See Brockman, col. 6, ll. 15-29.) There is nothing in this passage that pertains to "updated inventory data comprising specific operating parameters

3

for the inventoried equipment in the inventory management system" as recited in the claims. In Brockman, the information transmitted between the central, general-purpose computer 905 and the computers at the various remote locations have no relevance to any "specific operating parameters for [] inventoried equipment," as further recited in the claims. These signals in the Brockman system pertain primarily to counting what products are inventoried at the various remote locations.

Therefore, the Applicants respectfully submit that Brockman does not disclose or suggest "the plurality of inventory models comprising default configuration data for telecommunications equipment in a central office in a telecommunications network," as recited in claim 1. The Examiner concedes that Cornett and Vogler do not disclose or suggest this limitation. (See 1/23/09 Office Action, p. 4.) Thus, Cornett, Vogler and Brockman, alone or in combination, neither disclose nor suggest "the plurality of inventory models comprising default configuration data for telecommunications equipment in a central office in a telecommunications network," as recited in claim 1. Accordingly, this rejection should be withdrawn. Because claims 2-9 and 19 depend from, and, therefore, include all of the limitations of claim 1, it is respectfully submitted that these claims are also allowable for at least the foregoing reasons.

Claim 10 recites "[a] computer system for automatically updating inventory data, the computer system comprising: a remote computer in the computer system for storing a database comprising inventory model data, the inventory model data comprising default configuration data for telecommunications equipment of a central office in a telecommunications network; a network interface; a client computer, in communication with the remote computer over the network interface, the client computer comprising: a memory device for storing a program file; and a processor, functionally coupled to the memory device, the processor being responsive to computer-executable instructions contained in the program file, wherein the program file comprises a user interface for: requesting the inventory model data from the database; selecting one or more inventory models from the requested inventory model data; generating an inventory update form from the one or more selected inventory models; automatically populating the inventory update form with the updated inventory data, the updated inventory data comprising

specific operating parameters for the inventoried equipment in the inventory management system; and storing the updated inventory data in the database."

The Applicants respectfully submit that Cornett, Vogler and Brockman, alone or in combination, neither disclose nor suggest "a remote computer in the computer system for storing a database comprising inventory model data, *the inventory model data comprising default configuration data for telecommunications equipment of a central office in a telecommunications network,*" as recited in claim 10, for the reasons discussed above with reference to claim 1. Accordingly, this rejection should be withdrawn. Because claims 11, 12 and 20 depend from, and, therefore, include all of the limitations of claim 10, it is respectfully submitted that these claims are also allowable for at least the foregoing reasons.

Claim 13 recites "[a] system for automatically updating inventory data in an inventory management database, the system comprising: a client computer; a remote computer; a network connection between the local computer and the remote computer allowing data transfer therebetween; wherein the remote computer comprises: an inventory management database for storing inventory model data, the plurality of inventory models comprising default configuration data for telecommunications equipment in a central office in a telecommunications network; a software application program, residing on the remote computer, for automatically retrieving the inventory model data from the database; wherein the local computer comprises: a user interface for: requesting the software application program to retrieve the inventory model data from the inventory management database; selecting at least one inventory model from the received inventory model data; generating an inventory update form from the at least one selected inventory model; automatically populating the inventory update form with the updated inventory data, the updated inventory data comprising specific operating parameters for the inventoried equipment in the inventory management system; and sending the updated inventory data to the inventory management database."

The Applicants respectfully submit that Cornett, Vogler and Brockman, alone or in combination, neither disclose nor suggest "wherein the remote computer comprises: an inventory management database for storing inventory model data, *the plurality of inventory models*

comprising default configuration data for telecommunications equipment in a central office in a telecommunications network," as recited in claim 13, for the reasons discussed above with reference to claim 1. Accordingly, this rejection should be withdrawn. Because claim 14 depends from, and, therefore, includes all of the limitations of claim 13, it is respectfully submitted that this claim is also allowable for at least the foregoing reasons.

Claim 15 recites "[a] computer-readable medium having computer-executable instructions, which when executed by a computer, cause the computer to perform the steps of: requesting a plurality of inventory models from an inventory management system, the plurality of inventory models comprising default configuration data for telecommunications equipment in a central office in a telecommunications network; selecting at least one of the plurality of inventory models from the inventory management system; generating an inventory update form for each of the selected inventory models; automatically populating each inventory update form with updated inventory data, the updated inventory data comprising specific operating parameters for the inventoried equipment in the inventory management system; sending the updated inventory data to the inventory management system'[;] updating the inventory management system with the updated inventory data; and retrieving, from an external database, provisioning data for inventoried equipment in the inventory management system, wherein the provisioning data comprises data for provisioning at least one of special circuits, message trunks, and carrier circuits associated with the inventoried equipment in a telecommunications network."

The Applicants respectfully submit that Cornett, Vogler and Brockman, alone or in combination, neither disclose nor suggest "requesting a plurality of inventory models from an inventory management system, *the plurality of inventory models comprising default configuration data for telecommunications equipment in a central office in a telecommunications network,*" as recited in claim 15, for the reasons discussed above with reference to claim 1. Accordingly, this rejection should be withdrawn. Because claim 21 depends from, and, therefore, includes all of the limitations of claim 15, it is respectfully submitted that this claim is also allowable for at least the foregoing reasons.

CONCLUSION

It is therefore respectfully submitted that all of the presently pending claims are allowable. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

Dated: April 23, 2009

By: /Michael J. Marcin/
Michael J. Marcin (Reg. No. 48,198)

Fay Kaplun & Marcin, LLP
150 Broadway, Suite 702
New York, New York 10038
Tel.: (212) 619-6000
Fax: (212) 619-0276